

STATEMENT OF BASIS (AI No. 3443)

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0080764** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

COMPANY/FACILITY NAME: Weyerhaeuser Company
Zwolle Plywood and Sawmill Division
P. O. Box 158
Zwolle, Louisiana 71486

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Paula M. Roberts
Water Permits Division
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DATE PREPARED: February 20, 2009

I. PERMIT ACTION/STATUS:

Reason for Permit Action: Proposed Reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2711/40CFR 122.46.

In order to ease the transition from NPDES to LPDES permits, dual regulatory references are provided where applicable. The LAC references are the legal references while the 40 CFR references are presented for informational purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903 and will not have dual references. In addition, state standards (LAC 33:IX Chapter 11) will not have dual references.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX 4901, 4903, and 2301.F.

A. LPDES permit LA0080764: Effective date – November 1, 2003
Expiration date – October 30, 2008

B. LPDES permit LAR05N730: Effective date – June 11, 2008
Expiration date – June 10, 2013

C. Date Application Received: A renewal/modification application was received on April 30, 2008. The permittee requested the removal of Outfall(s) 001, 003 and 004 from LPDES permit LA0080764 and submitted an NOI for coverage under the Multi-Sector General Permit on April 30, 2008 for these three outfalls. Coverage under the Multi-Sector General Permit was granted on June 11, 2008.

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II. FACILITY INFORMATION:

A. LOCATION FACILITY- 2792 Obrie Street, in Zwolle, Sabine Parish
(Latitude 31°37'40", Longitude 93°38'49")

B. TYPE/ACTIVITY - Plywood and Sawmill

This applicant operates an existing plywood and sawmill facility. The applicant manufactures plywood and lumber from southern yellow pine (SYP) logs. The facility is permitted to produce 306 million square feet plywood and 75 million board feet of 2x4's, 4x4's and landscape timbers. Stormwater is the only discharges released at the facility. No process wastewater is discharged and the sanitary wastewater is discharged to the City of Zwolle Wastewater Treatment Plant.

C. Technology Basis – 40.CFR Chapter I, Subchapter N (Effluent Guidelines and Standards) parts 401, 405-415 and 417-471 have been adopted by reference at LAC 33:IX.4903.

Guidelines

Barking

Wet Storage

Sawmills and Planning Mills

Reference

40 CFR Part 429, Subpart A

40 CFR Part 429, Subpart I

40 CFR Part 429, Subpart K

Other Sources of Technology Based Limits:

Current LPDES Permit (effective November 1, 2003)

LDEQ Wood Storage Guidance

LDEQ Stormwater Guidance [letter dated June 17, 1987, from J. Dale Givens (LDEQ) to Myron Knudson (EPA)]

Best Professional Judgment

D. FEE RATE

1. Fee Rating Facility Type: Minor
2. Complexity Type: IV*
3. Wastewater Type: III
4. SIC code:2421

* The Complexity Type for this facility was changed from II to IV due to a determination by the Department after a review of the 2008 Annual Water Permit fees. The determination resulted in a change since the facility manufactures plywood from veneers.

III. RECEIVING WATERS:

STREAM – Unnamed ditch, thence into an unnamed ditch along Highway 475, thence into Toledo Bend Reservoir

BASIN AND SUBSEGMENT – Sabine River Basin, Subsegment No. 110101

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- DESIGNATED USES** -
- a. primary contact recreation
 - b. secondary contact recreation
 - c. fish and wildlife propagation
 - d. agriculture
 - e. drinking water supply

IV. OUTFALL INFORMATION:**Outfall 002**

- Discharge Type:** intermittent discharge of non-contact stormwater runoff from Basin C (south side of the dry kilns)
- Treatment:** None.
- Location:** At the point of discharge 300 feet south of the main office building, prior to combining with other waters (Latitude 31°37'39", Longitude 93°38'48")
- Flow:** Intermittent – 0.079 MGD
- Discharge Route:** Unnamed ditch, thence into an unnamed ditch along Highway 475, thence into Toledo Bend Reservoir

V. PROPOSED CHANGES from PREVIOUS PERMIT:

- A. In an effort to adequately evaluate the discharges from Outfall 002, a provision has been added to the reopener clause in Part II, Paragraph I of the draft permit. This provision requires the facility to submit analytical data for Outfall 002 (with the exception of COD, Oil & Grease, and pH) within one (1) year after the effective date of the permit in accordance with LAC 33:IX.2511.C.1.a.v. Upon submittal of the analytical data, the LDEQ may choose to modify this permit to change the effluent limits based on this information.
- B. The facility discharges to a Water Quality Act 303(d) stream. Therefore, a reopener clause has been added to Part II of the draft permit in the event that the permit requires reassessment regarding 303(d) status resulting in cooperation of the results of any Total Maximum Daily Load (TMDL) allocation for the receiving water body.
- C. Since the permittee has received coverage under the LPDES Multi-Sector General Permit, the stormwater discharge language has been removed from Part II-Other requirements. Stormwater discharges from this facility will be covered under the Stormwater Pollution Prevention Plan which is a requirement of the Multi-Sector General Permit.

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VI. PERMIT LIMIT RATIONALE:

Outfall 002 – intermittent discharge of non-contact stormwater runoff from Basin C (south side of the dry kilns)

Parameter	Monthly Average	Daily Maximum	Monitoring Frequency	Sample Type	Reference
Flow	Report	Report	1/3 months	Estimate	Current permit and LAC 33:IX.2701.1.1.b
COD	N/A	Report*	1/6 months	Grab	Current permit and LDEQ Wood Storage Guidance
Oil & Grease	N/A	15 mg/L	1/3 months	Grab	Current permit and LDEQ Wood Storage Guidance
pH	6.0 S.U. (min)	9.0 S.U. (max)	1/3 months	Grab	Current permit and LAC 33:IX.1113.C.1

***Daily Maximum of 250 mg/l will be used as an action level requiring further response as described in Section XIV for Pollution Practices to be instituted by the facility to reduce any potential degradation to the receiving stream due to high COD levels.**

VII. TMDL WATERBODIES:

Subsegment 110101, Toledo Bend Reservoir-Texas-Louisiana line to Toledo Bend Dam is listed on LDEQ's FINAL 2006 305(b)/303(d) Integrated Report with EPA Additions dated February 15, 2008 as fully supporting its designated uses of primary contact recreation, secondary contact recreation, drinking water supply and agriculture. Not being supported is the designated use of fish and wildlife propagation. The 305(b)/303(d) Integrated Report list Mercury (IRC-Category 5) as an impairment.

There is a Final TMDL dated October 1, 2007 for Mercury for Selected Segments in the Red River and Sabine River Basins, Louisiana which includes Toledo Bend (subsegment 110101). In accordance with this TMDL, point source discharges of mercury were not numerous and accounted for significantly less than 1% of the mercury loads. Therefore, discharges of mercury from point source loads were not reduced in these TMDLs.

The effluent guidelines for sawmills and planing mills point source category do not require effluent limitations or conditions for mercury. In addition, this is a renewal permit for an existing discharge that has not required mercury effluent limitations in the past. The facility does not utilize mercury in its process nor store mercury containing devices on site.

The Department has determined that the discharge from this facility does not have the reasonable potential to contain mercury at levels which will exceed water quality standards; therefore, no mercury effluent limitations or minimization program will be required in this permit.

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VIII. COMPLIANCE HISTORY/DMR REVIEW:

A compliance history was done covering the period of March 2004 to June 2008.

A. A DMR review for the period beginning March 2006 through February 2008 revealed no excursions.

B. Inspections – A facility inspection was conducted on May 20, 2004. The following items were noted in the inspection report:

1. Facility personnel collect effluent samples and complete pH analysis. All other effluent samples are completed by Gulf State Environmental lab.
2. DMRs revealed satisfactory effluent results.
3. Record/Reports are maintained well.

C. Compliance History - There are no open, appealed, or pending enforcement action for this facility.

IX. ENDANGERED SPECIES:

The receiving waterbody, Subsegment No. 110101 of the Sabine River Basin has not been identified by the U.S. Fish and Wildlife Service as habitat for any endangered species. This type of discharge is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

X. HISTORIC SITES

The discharges are from an existing facility, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

XI. "IT" QUESTIONS – Applicant's Responses:

Weyerhaeuser Company-Zwolle Plywood and Sawmill Division is a minor facility, therefore, IT Questions were not required to be submitted.

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XII. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

XIII. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the fact sheet. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper(s) of general circulation

Department of Environmental Quality Public Notice Mailing List

XIV. COD Action Level

Any exceedance of the COD action level shall result in the following requirements:

1. The sampling frequency for COD shall increase from 1/6 months to 1/quarter. This increased sampling frequency shall continue until a sample demonstrates compliance with the 250 mg/l COD action level at which time the monitoring frequency shall return to 1/6 months.
2. A written status report describing the actions taken to ensure reductions in exceedances of the COD action level shall be submitted to this Office with the quarterly DMR reports.
3. The Stormwater Pollution Prevention Plan shall be updated to incorporate the actions described in paragraph (2) above.

XV. STORMWATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

Stormwater discharges are covered under the Multi-Sector General Permit, LAR05N730, effective on June 11, 2008.

Should Multi-Sector General Permit coverage be cancelled at any time, Weyerhaeuser Company must request a permit modification to include additional requirements.

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Please note, this existing facility is subject to Chapter 25 of the LAC 33:IX. and in accordance with the requirements of LAC 33:IX.2511.C.1.a.v., the permittee is required to submit quantitative data based on samples collected during storm events and collected in accordance with LAC33:IX.2501 from all outfalls containing a stormwater discharge associated with industrial activity. Therefore, for outfall 002, the permittee shall submit analytical data for this outfall no later than one year after the effective date of the permit. Upon submittal of this analytical data, LDEQ may choose to modify, or alternatively revoke and reissue this permit to change effluent limitations based on the results of the submitted data. This provision has been added to the permit located in Part II, Section I.